

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF	)	
ILLINOIS	)	
	)	
Petition for a Certificate of Public Convenience and	)	
Necessity, pursuant to Section 8-406.1 of the Illinois	)	Docket No. 12-0598
Public Utilities Act, and an Order pursuant to	)	
Section 8-503 of the Public Utilities Act, to	)	
Construct, Operate and Maintain a New High	)	
Voltage Electric Service Line and Related Facilities	)	
in the Counties of Adams, Brown, Cass,	)	
Champaign, Macon, Clark, Coles, Edgar, Fulton,	)	
Macon, Montgomery, Morgan, Moultrie, Pike,	)	
Sangamon, Schuyler, Scott and Shelby, Illinois.	)	

**INTERVENOR PAULA COOLEY'S REPLY BRIEF ON REHEARING**

**NOW COMES** Intervenor Paula Cooley, through her attorneys, and in reply to ATXI's Initial Brief on Rehearing, states as follow:

**IV. B. Location of Mt. Zion Substation**

On pages 32-33 of its initial brief on rehearing, ATXI states : "If the Commission determines that the presence of the Macon County Conservation District property is a bar to the Kincaid route, however, Staff's substation Site Option #2 can still be utilized using some combination of existing proposed routes. (see Figure 2.) For Example, a route using ATXI's Primary Route from Pana to Mt. Zion to where it crosses ATXI's Alternate Route, then the Alternate Route, and then the tail end of the Kincaid Route would avoid the Macon County Conservation District property."

The above-quoted ATXI suggestion would add approximately 3 miles of length to the line, is the result of insufficient initial planning, and does not satisfy the requirement of being least-cost (least cost is the law, not least time). Assuming an approximate cost

of \$2 Million per mile, this suggestion adds \$6 Million to the Project. This also continues to ignore the problem with the VORTAC located across the road in Section 22.

Intervenor Paula Cooley again submits that the Commission was correct to deny the routing and substation issues from Pawnee to the eastern county line of Macon County, and also was correct to allow a rehearing on the Piatt-Douglas portions of the MZK route.

DATED this 7th day of January, 2014

By: /s Christopher M. Ellis

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### **PROOF OF SERVICE**

I, Christopher M. Ellis, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for Paula Cooley, herewith certify that I did on the 7th day of January, 2014, cause to be electronically filed with the Illinois Commerce Commission, Intervenor Paula Cooley's Reply Brief, and electronically served same upon the persons identified on the Commission's official service list.

/s Christopher M. Ellis  
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